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September 7, 2023

VIA CM/ECF
Hon. Valerie Figueredo, U.S.M.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: *Honeedew Investing LLC vs. Jose Abadi*
     Case No. 19-cv-08951-JPC-VF
     Request for Leave to File Motion to Substitute Parties

Dear Judge Figueredo:

We represent plaintiff Honeedew Investing LLC ("Honeedew" or "Plaintiff") in the above-referenced matter. Plaintiff writes to request this Court's permission to file a motion to substitute the estate of Jose Abadi and/or his successors or assigns as a party defendant in this matter. Plaintiff has not been served with any notice of death within the meaning of Federal Rule of Civil Procedure 25 nor has received service of any such document but has reason to believe that defendant Jose Abadi ("Defendant") is now deceased having passed away during this summer in the nation of Argentina. Plaintiff has to date been unable to identify Defendant's successor[1] but understands that the Defendant is survived by a spouse in addition to several children and other potential heirs.[2] Plaintiff intends to address the designation of an appropriate successor to Defendant in its forthcoming motion.

Thank you in advance for Your Honor's consideration.

Respectfully submitted,

/s/ Eric S. Medina
Eric S. Medina, Esq.

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[1] At the time of the Defendant's death it is believed the Defendant was a resident of the country of Argentina.
[2] Several of the underlying causes in this action include the fraudulent transfer of assets from Defendant to his son and daughter-in-law Carlos Abadi and Barbara Abadi.